

EXHIBIT 2

Filed Under Seal

1
2 UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF MINNESOTA

4
5 IN RE: PORK ANTITRUST LITIGATION

6
7 ***CONFIDENTIAL***

8 VIDEOTAPED DEPOSITION OF 30(b)(6) of
9
10 FERRARO FOODS by WENDY ROMM
11
12

13 DATE: June 22, 2022

14 TIME: 10:03 a.m. Eastern

15 PLACE: ***REMOTE***

16 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

17 JOB NO: 2022-847835
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1 W. ROMM

2 speaking for the company?

3 A. Yes.

4 Q. Okay. So I'll represent to you
5 that this document, this Deposition Notice
6 sets forth the subject matter areas in which
7 you were to be prepared to testify for today.

8 Do you understand that?

9 A. Yes, I do.

10 MR. HOLTZMAN: And, Ms. Romm, if
11 you would just look at the -- take as
12 much time as you need to review the
13 document. You can look at the
14 different subject matter areas if that
15 helps.

16 Q. Yeah, sorry. That was going to be
17 my next question. If you wouldn't mind
18 taking a moment and reviewing the subject
19 matter areas on page -- beginning on page 2
20 through page 7, I would like to just
21 generally ask you if you have been prepared
22 to testify on behalf of these -- these
23 topics. I can go through each one if that's
24 easier for you, too.

25 A. No, I don't think that's

1 W. ROMM

2 necessary. Yes, I am prepared to discuss
3 these.

4 Q. Okay. So you've read all of the
5 subject matter areas from page 2 through 7?

6 A. Yes.

7 Q. If at any -- you can -- you can
8 put that aside. If at any point we need to,
9 you know, refer back to any of the particular
10 subject matter areas, we can do that. But --
11 but, generally, I would like to you talk to
12 you a little bit about Ferraro Foods.

13 So what is Ferraro Foods?

14 A. Ferraro Foods is a distributor
15 mainly to pizzerias, Italian restaurants,
16 delis.

17 Q. And you said distributor.
18 Distributor of what?

19 A. Foods.

20 Q. Okay. Any particular kinds of
21 foods or all kinds of food?

22 A. We have all kinds of food. Mainly
23 in the Italian arena but, I mean, we do
24 cheeses, meats, non-foods, flowers, grocery
25 items, frozen foods.

1 W. ROMM

2 Q. Great. And if I were to ask you
3 to give me a high level overview of
4 Ferraro Foods business, is there anything you
5 would add to your description of what you
6 just gave me?

7 A. Well, I mean, we have multiple
8 distribution centers that deliver to
9 customers, and we are very -- growing
10 company. We just acquired two more
11 distribution centers, so now we have a total
12 of seven throughout the -- mainly the
13 East Coast.

14 Q. Okay. So you have seven
15 distribution centers. What's the purpose of
16 a distribution center?

17 A. To deliver to the customers.

18 Q. Okay.

19 A. And the reason we have seven is
20 because with the cost of gas these days, you
21 want to be closer to your customers than
22 further away.

23 Q. Okay. So expanding the geographic
24 footprint of your distribution centers, does
25 that expand the geographic area you have

1 W. ROMM

2 learn about your competitors' pricing to your
3 customers through interactions with your
4 customers, it sounds like; is that right?

5 A. Correct.

6 Q. Is that a pretty normal thing to
7 happen?

8 A. Yes.

9 Q. Would you agree with me that when
10 it comes to selling pork to your customers,
11 that pork competes against other proteins
12 like beef and chicken?

13 MR. BOURNE: Object to the form.
14 You can answer.

15 A. Not necessarily. I do not think
16 that.

17 Q. When you say "not necessarily,"
18 what do you mean by that?

19 A. Well, I mean, you know, customers
20 are customers. They want pork for pork and
21 they want chicken for chicken, beef for beef.
22 So they are usually not that interchangeable.

23 Q. Okay. Would you agree with me
24 that, for example, if the price of chicken
25 were to go up, that you might sell more pork?

1 W. ROMM

2 MR. BOURNE: Objection to form.

3 Incomplete hypothetical.

4 You can answer.

5 A. There is a possibility in some
6 cases. I don't think it would have a drastic
7 effect.

8 Q. Okay. How would you characterize
9 the geographic scope of Ferraro's business?

10 A. Well, we currently -- well, at the
11 time of this lawsuit, we represented from
12 Upstate New York all the way down to Georgia.

13 Q. Okay. When you say "at the time
14 of this lawsuit," so that's changed in recent
15 years?

16 A. Yes. Since 2018 we have acquired
17 additional companies, and that has expanded
18 our geological (sic) footprint.

19 Q. Okay. When you say "acquired
20 additional companies," is that you've
21 acquired additional distribution centers?

22 A. Yes.

23 Q. Okay. Would you characterize
24 Ferraro Foods' geographic footprint as
25 regional or national?

1 W. ROMM

2 A. So it's half the United States.

3 Q. Okay.

4 A. We are not national because we
5 don't cover the entire United States.

6 Q. Okay. But you have got a
7 footprint of distribution centers, and it
8 sounds like covers about half of the U.S.?

9 A. Correct.

10 Q. And each one of those distribution
11 centers has its own geographic footprint kind
12 of surrounding its own center; is that right?

13 A. Yes.

14 Q. Does your -- does Ferraro's
15 business vary at all across the various
16 geographic footprints of its distribution
17 centers?

18 A. Yes.

19 Q. How so?

20 A. Well, in certain markets, the
21 request for different products is there.
22 It's just like a different demographic of the
23 items that customers consume.

24 Q. Do your pork suppliers vary across
25 geographies?

1 W. ROMM

2 look identical so that they won't pick up on
3 it and your product -- the end results of the
4 product need to be identical.

5 Q. Okay. So you have got to do some
6 of that quality control work at the Ferraro
7 level, but you don't need to actually work
8 with the customer to get their approval for
9 that, right?

10 A. Correct.

11 Q. We've talked a bit about how price
12 is important to Ferraro and that there are
13 instances where you can shop around for
14 different vendors for your pork products,
15 right?

16 A. Yes.

17 Q. When you are doing that, does
18 Ferraro ever share with one pork vendor
19 pricing information from another pork vendor?
20 For example, would it ever go to Tyson and
21 say, hey, Hormel is offering me this, can you
22 match it, something like that?

23 A. No.

24 Q. Why is that?

25 A. Because it's just unethical. We

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might tell them that your pricing is too high, you know, things like that, or you are -- you know, you are close to \$0.30 off on pricing, but we won't give exact parameters because you would lose credibility with the supply -- you should lose credibility with the supplier you're talking to because I don't think they would want me to go out and give their pricing to their competitor.

Q. Okay. Does Ferraro purchase pork products pursuant to contracts?

A. Formulas, yes.

Q. What do you mean when you say "formulas"?

A. We have formula pricing based off of the meat blocks.

Q. What do you mean when you say "meat blocks"?

A. Like the 72 percent trim, pork butts. It's a combination of -- it's an overage over a combination of different meat blocks makes up your pepperoni pricing. Makes up your sausage pricing.

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1 W. ROMM

2 Q. Okay. So -- sorry, I just want to
3 get an understanding of what a meat block is
4 and where that -- it sounds like that's a
5 part of your pricing formula, but I'm just
6 curious where does that information come
7 from?

8 A. It comes off -- it's publically
9 traded.)

10 Q. Where is it publically traded?

11 A. USDA Meat -- USDA -- it's
12 called -- I'd have to look at my computer for
13 the exact name of it. USDA Agriculture.

14 Q. Okay. So you have got -- for your
15 pork products you buy, you've got formulas
16 that are -- that are tied to these publically
17 traded meat block vendors; is that right?

18 A. Yes.)

19 Q. And are these formulas that you
20 arrive at with your pork vendors, are they
21 memorialized in contracts you have with your
22 vendors?

23 A. Yes, but they can change the
24 formula with a given notice.

25 Q. Okay. So they can change the

1 W. ROMM

2 formula, but it sounds like you can also shop
3 around for a better formula with other
4 suppliers; is that right?

5 A. Yes.

6 Q. And does Ferraro enter into
7 contracts with its vendors where the formulas
8 are valid for a certain period of time?

9 A. Yes, we have in the past.

10 Q. Is there a typical length on
11 those?

12 A. It's usually like a one-year
13 shelf -- one-year life.

14 Q. Okay. Since joining Ferraro, what
15 is the longest time period that you know of
16 that Ferraro was locked into a contract with
17 a pork producer?

18 A. One year.

19 Q. Okay. Just so I'm understanding,
20 you know, there will be instances where you
21 contract with a pork vendor for a year where
22 you agree on a pricing formula with them
23 where that pricing formula is valid for that
24 year?

25 A. Yes. The formula is valid but

1 W. ROMM

2 your pricing doesn't stay the same.

3 Q. Right. Because it's tied to,
4 like --

5 A. The meat block markets, yes.

6 Q. Okay. And -- and the meat block
7 markets -- so the formula will stay the same,
8 but the pricing might fluctuate because of
9 fluctuations in the publically traded price
10 of pork; is that right?

11 A. Correct.

12 Q. Okay. Are the contracts ever
13 shorter than a year that you engage in?

14 A. Yes. Some -- some manufacturers
15 won't go out that long.

16 Q. Okay. Which ones?

17 A. They will do a three-month. Maybe
18 a six-month.

19 Q. Which manufacturers are those?

20 A. Well, Tyson is one of them.

21 Q. When you are negotiating a
22 contract with a pork supplier, are there
23 standard price terms that you include in the
24 formulas?

25 A. No. Well, I mean, it's like

1 W. ROMM

2 overages, freight. Their overages usually
3 consist of their labor cost, packaging.

4 Q. Okay. Do these pricing formulas
5 that you contract for -- vary on -- based on
6 the type of pork products you are purchasing?

7 A. Yes.

8 Q. How so?

9 A. Usually it's the type of meat that
10 the formula consists of that'll vary.

11 Q. Okay. So going back to your
12 particular vendors, focusing on Tyson, what
13 types of pork products does Ferraro Foods
14 purchase from Tyson?

15 A. Pepperoni, pork toppings. That's
16 pretty much it on Tyson.

17 Q. Okay. Anything else?

18 A. No, that -- that would be it.

19 Q. All right. And you have got a
20 contract with Tyson for -- for these
21 products?

22 A. The pepperoni side, yes.

23 Q. Okay. That includes a pricing
24 formula like we've discussed?

25 A. Yes.

1 W. ROMM

2 Q. And is this a contract that you
3 negotiated with Tyson?

4 A. Yes.

5 Q. For Tyson, how often do you
6 renegotiate these contracts?

7 A. Every year.

8 Q. For Tyson, does Ferraro negotiate
9 any discounts or rebates or anything like
10 that or promotions?

11 A. Yes.

12 Q. Can you describe those for me?

13 A. The promotions they included in
14 our pricing, they -- over and above our
15 formula, they give us a marketing allowance.
16 They give us cash discount terms. They
17 participate in our food shows and different
18 marketing sales meetings, you know, that is
19 over and above our formula.

20 Q. Okay. So what's a marketing
21 allowance?

22 A. A marketing allowance is our
23 monies paid on the backside to help us market
24 and drive their products out to our
25 customers.

1 W. ROMM

2 Q. What do you mean when you say
3 money paid on the backside?

4 A. So it's not in our pricing. So in
5 other words, it -- the end of every month,
6 based on the tonnage we purchase, we get X
7 number of cents per pound back as a rebate.

8 Q. So sounds --

9 A. That money is to be used to help
10 market their goods out to our customer base.

11 Q. Okay. So you get a volume rebate,
12 it sounds like, and then you have got to use
13 that money to market your products?

14 A. Yes.

15 Q. Are there separate volume
16 discounts or rebates that you get for, you
17 know, for which you can use the money for
18 whatever you want?

19 A. Well, I mean, even that marketing
20 money, we could actually use the money for
21 whatever we want, but it is set up as a
22 marketing fund and we do try to use it to
23 market products.

24 Q. Okay. Are there any other
25 discounts or rebates with Tyson that you get

1 W. ROMM

2 that we have not discussed?

3 A. No.

4 Q. So same questions for Smithfield,
5 what products do you buy from Smithfield?

6 A. Pepperoni, salami, bacon.

7 Q. And when did you begin
8 purchasing -- when did Ferraro begin
9 purchasing these products from Smithfield?

10 A. Prior to me coming on as an
11 employee.

12 Q. And are these purchases pursuant
13 to contract?

14 A. Pepperoni is on the contract.

15 Q. Okay. What about the other pork
16 products you mentioned?

17 A. Oh, and our salami is on a
18 contract, Genoa salami.

19 Q. What is --

20 A. The other ones are on weekly
21 pricing.

22 Q. Okay. What's the difference
23 between purchasing a pork product pursuant to
24 a contract versus weekly pricing?

25 A. Well, our contract is for a longer

1 W. ROMM

2 time period. It's longer than a week.

3 Basically every month we get new pricing on

4 it and it's based on a formula off of the

5 meat blocks.

6 Q. Why does Ferraro buy some products

7 pursuant to a contract and some pursuant to

8 weekly pricing?

9 A. Because we are large enough on --

10 you have to have high volume to do a

11 contract.

12 Q. Okay. So is it fair to assume

13 that for the products that Ferraro is on

14 weekly pricing arrangements for, that those

15 are not your high volume products?

16 A. That is correct.

17 Q. Are there any discounts or

18 promotions that you get with Smithfield?

19 A. Yes, we get marketing rebate, they

20 pay for food show. They advertise in our

21 magazines and they participate in sales

22 meetings.

23 Q. Okay. I just want to run down the

24 other pork suppliers you have, and then I

25 figured we can break for the lunch that you

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had requested. If that sounds okay with you.
It might take just another couple -- five
minutes to get through the others.

Is that all right?

A. That's fine.

Q. Okay. So how about Clemens, what
pork products do you buy from Clemens?

A. We buy bacon. We buy breakfast
sausages. We buy hams, salami.

Q. Anything else?

A. Pork butts.

Q. Are these products pursuant to
contract?

A. No. They are on price list. The
only part of the contract that we have with
them was a volume discount.

Q. What's the volume discount for?

A. They gave us a contract that based
on tonnage purchased, we would get a volume
discount which is often moist.

Q. Is that all of the products mixed
together?

A. Yes.

Q. So you don't have an individual

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W. ROMM

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contract with Clemens over any specific pork

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product. You buy those all on list price,

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but it sounds like you do get a volume

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discount if you buy enough collective

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products from them?

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A. Correct.

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Q. And why don't have you any

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individual contracts with Clemens like do you

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for Tyson and Smithfield?

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A. Because it's more of their -- it's

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all their label, and they just don't do the

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contracts. We are not nearly as large a

14

volume with Clemens as we are with some of

15

the Tyson and Smithfield.

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Q. Okay. And what about Hormel?

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A. Hormel, we get -- they have weekly

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pricing that comes out, but then we get

19

monthly geographic pricing on high volume

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items like pepperoni.

21

Q. What do you mean "monthly

22

geographic pricing"?

23

A. Well, like Ferraro Foods of

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New Jersey will get a better price on

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pepperoni than North Carolina will.

1 W. ROMM

2 Q. Why is that?

3 A. Because the demographics of our
4 location determine that price, and they just
5 do a big deviation based on the geographic
6 area.

7 Q. So is that -- is that because the
8 Ferraro Foods in New Jersey sells more
9 pepperoni than North Carolina does, for
10 example?

11 A. Not -- no, uh-uh. That is not my
12 belief on that one.

13 Q. Oh, okay.

14 A. It is more that the New Jersey,
15 New York metro region is -- there is more
16 competition and, therefore, they have to
17 sharpen their pencil.

18 Q. Understood. There is more
19 pepperoni suppliers in that Tri-state area
20 region, it sounds like --

21 A. Yes.

22 Q. -- than North Carolina?

23 So you get better pricing there,
24 it sounds like?

25 A. Yes.

1 W. ROMM

2 Q. And then before we break, just
3 generally walk me through your private
4 label -- who sells your private label
5 products?

6 A. Our salesmen.

7 Q. Where do you procure your private
8 sales label pork products from?

9 A. Well, depending on the item, I
10 mean, I get pepperoni from Smithfield. I get
11 Genoa salami with my private label from
12 Smithfield. I also get a private label
13 pepperoni from Tyson.

14 Q. Okay. And are all those private
15 label products pursuant to contract with
16 formulas that we have discussed?

17 A. Yes.

18 MR. RIPA: Okay. All right.
19 Does now sound like an okay time to
20 break for lunch for you?

21 THE WITNESS: Yes.

22 MR. RIPA: Okay. Let's go off
23 the record.

24 THE VIDEOGRAPHER: The time is
25 12:31 p.m. We're now going off the

1 W. ROMM

2 A. Well, basically we would ask Tyson
3 to give us a growth program, and then they
4 come through and they would submit a growth
5 program and then the negotiations back and
6 forth would be, can you increase it by
7 another penny or two pennies, you know, like
8 that.

9 Q. Okay. So generally speaking, with
10 your pork suppliers, you will broach the
11 topic of wanting a growth program which,
12 again, is another way of saying a
13 volume-based discount program; is that right?

14 A. Yes.

15 Q. And then you'll engage in
16 back-and-forth negotiations with them over
17 what the exact terms of that volume-based
18 discount will look like?

19 A. Yes.

20 Q. Okay. So they will propose, you
21 know, a certain volume-based discount and
22 then you will counter them with, actually we
23 would like a little more, and you will meet
24 somewhere in the middle typically; is that --
25 is that how it works?

1 W. ROMM

2 A. Correct.

3 Q. Okay. Does Ferraro have leverage
4 in those negotiations because of the amount
5 that you purchase from these companies?

6 MR. BOURNE: Form.

7 A. Depending on the company, we may.

8 Q. Okay. What do you mean by that?

9 A. Well, I mean, you know, some
10 companies this is their program, you take it
11 or leave it, and it's the same program
12 offered to everybody. Other companies you do
13 have the ability to negotiate.

14 Q. Okay. So what are the examples
15 of -- of the companies where you had the
16 ability to negotiate?

17 A. If we had a -- if we had a program
18 with -- on our private label, we would have
19 the ability to negotiate programs with
20 companies like Smithfield. We usually have
21 more of an ability to negotiate than a
22 company like a Tyson Foods.

23 Q. Okay. So is that -- you mentioned
24 you have got the ability to negotiate when
25 you're dealing with your private label

1 W. ROMM

2 products. Is that because you've got the
3 ability to switch producers for who makes --
4 so you can threaten to move your business if
5 they don't give you the discount you want?

6 A. That is one reason. And, also,
7 because it's not their brand being sold in
8 the market area at a lower price, it's not as
9 much exposure to them.

10 Q. Can you explain that second part
11 to me? What do you mean "it's not as much
12 exposure to them"?

13 A. Okay. If it's my brand, and I'll
14 just use an example, one of my brands is
15 Antica Corte pepperoni, if that is out in the
16 market price at a lower price than Tyson's
17 brand of pepperoni, then Tyson will be hit up
18 by other distributors, how come some of our
19 foods is selling so low? Where Antica Corte,
20 they don't know how.

21 MR. RIPA: I would like to pull
22 up tab 23, please.

23 (Whereupon, Romm Exhibit 4,
24 FR-PORK0000007148 was marked for
25 identification as of this date by the

1 W. ROMM

2 A. Yes.

3 Q. What does that mean?

4 A. That means if we take -- if we sit
5 there and deduct off their invoice, it could
6 be reverse billed. They'll come back and
7 bill us back.

8 Q. Got it. So what does that mean in
9 practice? How would that actually --

10 A. In other words, if we place a
11 purchase order and they bill us a higher
12 price than what's on the purchase order, we
13 deduct down to the purchase order price, they
14 have the right, based on this, to come back
15 and bill us back for that monies, for those
16 monies -- for those deductions.

17 Q. Got it, okay.

18 How are the prices here -- first
19 of all, where are the prices in this table?
20 Is that in the column all the way to the
21 right under "LB."?

22 A. Yeah, where it says "DELIVERED"
23 and then the "CASE," the pound would be,
24 yeah, further to the right.

25 Q. So that would be -- under the

1 W. ROMM

2 "CASE" column, it would be price --

3 A. Next to the "CASE," there is a
4 column that's not being shown right here that
5 says "LB."

6 Q. Yeah, so that would be price per
7 case and price per pound?

8 A. Correct.

9 Q. How do you arrive at those prices
10 with Sugardale?

11 A. Those are just given to us by
12 Sugardale.

13 Q. Got it. So do you negotiate with
14 Sugardale at all?

15 A. No.

16 Q. Are these examples of private
17 label Ferraro products or are these just
18 Sugardale?

19 A. No. These are Sugardale labels.

20 Q. Okay. And are you sourcing these
21 products because Villa Enterprises, you know,
22 requested specifically these Sugardale
23 products?

24 A. That is correct.

25 Q. Okay. So this would be an

1 W. ROMM

2 example, like what we talked about before,

3 where you have a customer who says, you know,

4 I want this specific product from this

5 specific company, go get it, and Ferraro goes

6 and gets it?

7 A. Yes.

8 Q. Okay. Let's go to tab 24.

9 (Whereupon, Romm Exhibit 6,

10 FR-PORK0000002984 through '2985 was

11 marked for identification as of this

12 date by the Reporter.)

13 Q. This is an email Bates-stamped

14 FR-PORK0000002984 from John Altadonna to

15 yourself with the subject "DEC Pricing

16 Update." It's got one attachment, it looks

17 like.

18 A. It looks like that's where

19 John Altadonna is just forwarding the email

20 that he got from Mike Rosen that had the

21 pricing in it to me.

22 Q. Okay. Yeah, so could you walk me

23 through what's going on here? Do you

24 recognize this document?

25 A. Yeah. I mean, I can probably

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decipher it. He is forwarding to me. If you scroll down in the document -- go to the bottom of the document. It's easier to go from the bottom up.

Okay. Mike Rosen is with Villa Restaurant Group. He received the pricing update from Sugardale, and then he sent it to John Altadonna who does the national account pricing, and he would be responsible to make sure the pricing is accurate in Ferraro's computer system for Villa Pizza.

John then forwarded the pricing to me so I could make sure that the -- our system was up to date and the buyers were up to date.

Q. Got it. Okay. So if you look at the very beginning of this email chain, which I think starts on page 2, this actually comes from a Jack Moore from Smithfield to Michael Rosen?

A. Oh, I don't know. Yeah. So that's when they were using a Smithfield product for their Villa, I guess.

Q. Okay. So -- so looks here like

1 W. ROMM

2 Q. Okay. What's "a trader" and how
3 does that differ?

4 A. Well, it's really somebody
5 brokering a load that might be coming out for
6 deal, but it's still coming from a specific
7 manufacturer.

8 Q. Okay. Have you ever had to, you
9 know, in an emergency, to fill an order, for
10 example, purchased from, you know, a grocery
11 store or a mass merchandiser?

12 A. No.

13 Q. Do you ever purchase pork products
14 from competitors, like a broad-line
15 distributor or anything like that?

16 A. No.

17 Q. What about from a restaurant
18 supply store?

19 A. No.

20 Q. So I think you mentioned that you
21 have purchased pork products from Clemens,
22 Hormel, Smithfield, and Tyson.

23 Have you ever purchased pork
24 products from JBS?

25 A. No. No.

1 W. ROMM

2 Q. Indiana Packers?

3 A. No.

4 Q. Seaboard Foods?

5 A. No.

6 Q. What about Triumph Foods?

7 A. No.

8 Q. Okay. Has Ferraro ever purchased
9 pork through a buying group or a co-op?

10 A. We could have purchased through a

11 buying group because we are a member of

12 UniPro.

13 Q. Okay. So what's UniPro?

14 A. UniPro is a buying group of
15 authoritative (sic) distributors based out of
16 Atlanta, Georgia.

17 Q. Okay. So have you purchased pork
18 products through UniPro?

19 A. Well, some of our vendors might
20 have UniPro rebates. You don't really
21 purchase the product through UniPro, but
22 UniPro has a program.

23 Q. When you say, "Some of our vendors
24 might have UniPro rebates," what does that
25 mean?

1 W. ROMM

2 A. They have a UniPro program.

3 Q. When you say "vendor," do you mean
4 like a Tyson, for example?

5 A. I don't believe Tyson is a member
6 of UniPro.

7 Q. Okay. Are there any pork -- can
8 you give me examples of pork vendors that
9 Ferraro has that -- that are members of
10 UniPro?

11 A. Hormel might be. I'm not
12 100 percent positive, though. I don't know
13 all of the UniPro vendors without looking
14 them up.

15 Q. Okay. So do you know when you are
16 buying pork products pursuant to a UniPro
17 program or not?

18 A. No.

19 Q. Okay. Does Ferraro, in your view,
20 benefit from the existence of UniPro?

21 A. Yes.

22 Q. How so?

23 A. Because there is a lot of vendors
24 we buy from that have programs with UniPro,
25 so they pass those program monies back to us.